

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure	)	CC Docket No. 94-102
Compatibility with Enhanced E911 Emergency	)	
Calling Systems	)	

To: The Commission

STATUS REPORT  
THUMB CELLULAR, LLC

Thumb Cellular, LLC, (Thumb) by its attorney, pursuant to the Commission's February 22, 2006, *Order*, FCC 06-15, ¶ 14, hereby submits a status report regarding the 95% location capable handset penetration requirement. In support whereof, the following is respectfully submitted:

(1) The number and status of Phase II requests from PSAPs (including those requests it may consider invalid): Thumb has received three requests for Phase II service from PSAPs. Thumb has received three PSAP requests, the implementation dates for the provision of service to the PSAPs are provided in #2 below.

(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by its network: Huron County PSAP, 05-03-04, Sanilac County PSAP, 05-07-04, Tuscola County PSAP, 05-10-04.

(3) The status of Thumb's coordination efforts with PSAPs for alternative 95% handset penetration dates: Thumb coordinated on a regular basis with the PSAP's to attain the 95% penetration by 07-31-06.

(4) Thumb's efforts to encourage customers to upgrade to location capable handsets: Thumb Cellular made several attempts during the last two years to encourage customers to update to location-capable phones. Thumb Cellular offered such specials as "free location-capable phone" with a new two-year contract. Thumb Cellular also ran numerous ads, both in print and billboard, as well as on the radio to alert customers to the benefits of a location-capable handset. During the current reporting period Thumb contacted customers on an individual basis to encourage them to upgrade to a location based phone until the 95% location capable handset penetration level was achieved.

(5) The percentage of Thumb's customers with location-capable phones: As reported in the prior report (August 1, 2006), Thumb Cellular has achieved, and maintains, a subscriber penetration level of 95%+.

(6) Detailed discussion about the efforts made to achieve compliance and whether Thumb is on schedule to meet the extended 95% penetration deadline: The 95% location capable handset penetration level has been achieved and is being maintained.

January 31, 2007

Respectfully submitted,  
THUMB CELLULAR, LLC  
Timothy E. Welch  
Hill & Welch  
1330 New Hampshire Ave., N.W. #113  
Washington, D.C. 20036  
202-775-0070[9026] [FAX]